Reprocessing and Reuse of Single Use Devices

Timothy A. Ulatowski Director, DDIGD/FDA June 15, 2000

Outline

- The public perception of reuse of single use devices and the impetus for regulation
- The economics of reuse
- The players
- FDA's plan of action
- International impact

Perception and Impetus

- "Just the thought of this makes me queasy" says John Doe.
- This affects everyone
- Clear, opposing opinions
- Am I at risk?
- What is the government doing to protect me?

Economics

- Intended to skim some expenses
- Does it really save money?
 - Costs
 - regulatory
 - Iiability
 - technical
 - ethical
 -etc

Players

- Hospitals (and others later?)
- **OEMs**
- Third parties (reprocessors and others)
- **FDA**
- **JCAHO**
- States
- others

FDA Plan

- You are a manufacturer
- You must comply with all requirements of F, D, and C Act
- Quality systems needed
- Hospital registration and other items
- Roll in of premarket requirements
- Future possibilities

International Impact

- Wait and see; or
- You are a manufacturer; or
- Don't do it!

Need for international consensus standards development